

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

**JADA BRIGGS on Behalf of Herself
and on Behalf of All Others
Similarly Situated**

Case No. _____

Plaintiff(s),

**COLLECTIVE ACTION
JURY TRIAL DEMANDED**

V.

**DEARBORN PANTHEION, LLC,
MARWAN HAIDAR, MELISSA
HASHEM**

Defendants.

ORIGINAL COLLECTIVE ACTION COMPLAINT

I. SUMMARY

1. Defendants Dearborn Pantheon, LLC, d/b/a Pantheon Club and individual Defendants Marwan Haidar, and Melissa Hashem (hereafter “Defendants”) required and/or permitted Jada Briggs and others similarly situated (hereafter “Plaintiff” or “Plaintiffs”) to work as exotic dancers at their adult entertainment club but refused to compensate them at the applicable minimum wage. In fact, Defendants refused to compensate them whatsoever for any hours worked. Plaintiffs’ only compensation was in the form of tips from club patrons, and even those were partly confiscated by the club.